

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

Remarks/Arguments

There are no amendments to the specification, claims or the drawings herein.

In the Claims, Claims 1-26 and 30-33 are pending. Claims 1-26 and 30-33 are rejected. Reconsideration is respectfully requested.

In a previous Response/Amendment filed May 24, 2005 (hereinafter 'Previous Response'), Applicant traversed the Examiner's rejection of then pending Claims 1-29 under 35 U.S.C. 102(e) as being anticipated by Bhat, U. S. Patent Application Publication 2002/0073314 A1 (hereinafter 'Bhat'). Applicant argued that the Examiner failed to show Bhat disclosed, explicitly or implicitly, "each element of the claim under consideration" (*W.L. Gore & Associates v. Garlock*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983)) or that Bhat disclosed the claimed elements "arranged as in the claim" (*Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984)), as required by the Federal Circuit for *prima facie* anticipation under 35 U.S.C. 102.

In a *Response to Arguments* section of the present Office Action mailed September 8, 2005 (hereinafter 'Present Action'), the Examiner contended, "Applicant's argument filed on May 24, 2005 [i.e., Previous Response] for claims 1-14 have been fully considered but are not persuasive". In part, the Examiner disagreed with Applicants assertion that Bhat failed to disclose, "wherein when the electronic device is disabled, a shutdown process switches the electronic device to an OFF state", recited in Applicant's Claim 1. The Examiner contended, "Bhat discloses this feature" and referenced Page 2, paragraphs "0025 and "0026" in support of the contention. In particular, the Examiner appeared to cite paragraph [0025], second sentence, in which Bhat discloses, "...the security module 116 [shown in Figure 1] is coupled to the operating system and automatically **locks out unauthorized access** to the electronic devices 208, 210 by requiring username and/or password information every time the electronic devices 208, 210 are **started or when the information button** 212 [shown in Figure 2A and 2B] is selected" (**emphasis added**). The Examiner contended that the cited disclosure "meets the limitation of when the electronic device is disabled, a shutdown process switches the electronic device to an

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

OFF state". No extrinsic evidence beyond the Bhat disclosure was provided by the Examiner.

Applicant respectfully but strongly disagrees. The Examiner's response is merely a restatement of the original rejection thoroughly rebutted by Applicant in the Previous Rejection. Contrary to the Examiner's contention, the disclosure by Bhat does not meet, "the limitation of when the electronic device is disabled, a shutdown process switches the electronic device to an OFF state". Instead, Bhat discloses only that the "security module 116 ... locks out unauthorized access" and that the lock out occurs when the electronic device is either "started or when the information button 112 is selected". Bhat never discloses, "a shutdown process switches the electronic device to an OFF state", as claimed by Applicant. Bhat is silent on any 'shut down' process, mode or operation what-so-ever and never mentions or suggests any process that "*switches* the electronic device to an OFF state". In fact, Bhat never even explicitly discloses an "OFF state". Bhat only discloses disabling the device, which embraces a wide array of actions, as one skilled in the art would readily attest, such as simply locking a user interface until a password is entered.

For example, a multi-user computer running UNIX generally requires a user to enter a user name and password to 'log on' before files and programs may be accessed. As far as the user is concerned, the computer is effectively 'disabled' until the user logs on. However, the UNIX computer is certainly not 'OFF' since other users may be logged on and actively using the computer. Another example is a personal computer or laptop computer running Windows XP®. Such computers can be configured to require entry of a password at startup. The computer is operational (e.g., the CPU is active and the disc drive is running) before the password is entered. However, the computer is effectively disabled and the data is 'locked out' preventing unauthorized access until the password is entered. Thus, simply disclosing locking out unauthorized access to a device or even disabling the device fails to disclose 'a shutdown process' or any process or equivalent thereof that necessarily "*switches* the electronic device to an OFF state", as recited in Applicant's Claim 1 (*emphasis added*). Applicant is at a loss to understand why the Examiner contends in the Present Action that the disclosure of Bhat "meets the limitation". Reconsideration is earnestly requested.

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

Applicant respectfully reminds the Examiner that, “[a]nticipation requires the disclosure in a single prior art reference of *each element* of the claim under consideration” (*emphasis added*). *W.L. Gore & Associates v. Garlock*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983) *cert. denied*, 469 U.S. 851 (1984). “In deciding the issue of anticipation, trier of fact must identify the elements of the claims, determine their meaning in light of the specification and prosecution history, and identify corresponding elements disclosed in the allegedly anticipating reference.” *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984). “There must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention.” *Scripps Clinic & Research Found. v. Genentech Inc.*, 927 F.2d 1565, 18 USPQ 2d 1001, 1010 (Fed. Cir. 1991). Clearly, Bhat fails to explicitly disclose or even suggest “each element” recited in Applicant’s claims, as discussed above. Moreover, clearly there is a difference, as viewed by a person of ordinary skill, between that claimed by Applicant and that disclosed by Bhat.

In the Present Action, the Examiner rejected Claims 1-14, 30-31 and 33 under 35 U.S.C. 102(e) as being anticipated by Bhat, U. S. Patent Application Publication 2002/0073314 A1 (hereinafter ‘Bhat’).

Applicant once again respectfully traverses the rejection on the grounds that a *prima facie* case of anticipation with respect to Bhat has not been established. In particular, Applicant submits that Bhat fails to disclose, explicitly or implicitly, “each element of the claim under consideration” (*W.L. Gore & Associates v. Garlock*, cited *supra*) and that Bhat fails to disclose the claimed elements “arranged as in the claim” (*Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, cited *supra*), as required by the Federal Circuit for *prima facie* anticipation under 35 U.S.C. 102.

As discussed in the Previous Response, Bhat discloses a system and method for identifying lost electronic devices. In particular, Bhat discloses, “providing ownership identification information of lost electronic devices, such as portable computers, personal data assistants (PDAs) and/or mobile telephones” wherein “ownership identification indicia of the device” is “displayed [on a graphical user interface of the device] when the device is lost” (Bhat, Abstract, lines 1-4, lines 7-9, and lines 13-14). Referring to Figure 1 and paragraph [0019], Bhat discloses, “the

Appl. No. 09/982,345
Resp./Amtd. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

electronic device includes an information mechanism 112, such as an information button", the information mechanism being "adapted to display the ownership indicia on the display 114 of the electronic device when it's selected". Bhat further discloses including a "security module 116" that "provides protected access to data stored 117 on the electronic device 110 by *locking out unauthorized access* to the data 117" (*emphasis added*) (Bhat, Para. [0020]). The security module when coupled to an operating system of the device, "automatically locks out unauthorized access to the electronic devices 208, 210 by requiring username and/or password information every time the electronic devices 208, 210 are started or when the information button 212 is selected" (Bhat, Para. [0025]).

For the Examiner's convenience, Applicant's arguments from the Previous Response are reiterated here. Bhat fails to disclose, or even suggest, each element of Applicant's claims, contrary to the Examiner's contention. For example, regarding Applicant's base Claim 1, as previously amended, Bhat does not disclose at least "wherein when the electronic device is disabled, *a shutdown process switches* the electronic device to *an OFF state*", as recited therein (*emphasis added*). In fact, Bhat *never* discloses shutting down the device when the electronic device is disabled. Instead, Bhat merely discloses "locking out unauthorized access to data 117", which may be accomplished *without* shutting down the device, as one skilled in the art can readily attest.

Since Bhat is silent on *shutting down* the device in order to lock out unauthorized access to data and there are clearly other ways to provide such lock functionality other than shutting down the device, Bhat fails to disclose that recited in Applicant's Claim 1. Regarding base Claim 30, Bhat at least fails to disclose an electronic device having instructions of a computer program that, when disabled by a security lockout, "further implement initiating a shutdown process and switching the device to an OFF state".

Therefore, for all of the reasons set forth above, the teachings of Bhat at least lack a disclosure of one or more elements recited separately in each of Applicant's base Claims 1 and 30. In addition, Bhat fails to disclose the respective claimed elements "arranged as in the claim" (*Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co. cited supra*). As such, Applicant respectfully submits that it

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

cannot be shown that there is essentially "no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention", as required by the Federal Circuit to support a rejection under 35 U.S.C. 102. *Scripps Clinic & Research Found. V. Genentech Inc.*, 927 F.2d 1565, 18 USPQ 2d 1001, 1010 (Fed. Cir. 1991). Hence, the Examiner failed to establish and support *prima facie* anticipation by Bhat of at least the base Claims 1 and 30. The rejection of base Claims 1 and 30 under 35 U.S.C. 102(e) with respect to Bhat must be withdrawn.

Moreover, rejected Claims 2-14 are ultimately dependent from and include all of the limitations of base Claim 1. Rejected Claims 31 and 33 are ultimately dependent from and include all of the limitations of base Claim 30. The Examiner lacks support for *prima facie* anticipation by Bhat of dependent Claims 2-14, 31 and 33 for at least the reasons set forth above for respective base Claims 1 and 30. Hence, the Examiner must further withdraw the unsupported rejection of dependent Claims 2-14, 30 and 31 under 35 U.S.C. 102(e) with respect to Bhat.

Although not so stated, the Examiner apparently withdrew the rejection from the Previous Action of Claims 15-26 under 35 U.S.C. 102(e) in view of Bhat. Applicant appreciates the Examiner's withdrawal of the rejection.

Further, in the Present Action, the Examiner rejected Claims 15-26 and 32 under 35 U.S.C. 103(a) as being unpatentable over Bhat in view of Tanaka et al., U.S. Published Patent Application No. 2002/0162011 (hereinafter 'Tanaka et al.'). The Examiner admitted that Bhat does not explicitly disclose, "a device detecting a perturbation of the electronic device", and contended that Tanaka et al., "in the same field of endeavor", disclose a "vibration sensor/perturbation sensor device for monitoring ...". The Examiner further contended that it would have been obvious, "to combine the features perturbation sensor/vibration sensor [*sic*] as per teachings of Tanaka into the method as taught by Bhat". The Examiner further contended that such a combination would, "provide a secure system by providing protection to the important data stored in portable devices when the devices are stolen. [see paragraph 0004]" (hereinafter 'Examiner's motivation').

Applicant respectfully traverses the rejection on the grounds that the Examiner failed to establish and properly support a *prima facie* case of obviousness with respect

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

to Bhat in view of Tanaka et al. Specifically, the Examiner does not show with respect to the rejected claims one or more of 1) "some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings"; 2) "a reasonable expectation of success" in modifying or combining the teachings of the references; and 3) that the prior art references "teach or suggest all the claim limitations", as required by the courts. MPEP, Section 2142, *Establishing a Prima Facie Case of Obviousness*. Moreover, the Examiner failed to establish that the teaching or suggestion to make the claimed combination and the reasonable expectation of success are both "found in the prior art, and not based on applicant's disclosure". *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir.1991) (*emphasis added*). In short, the Examiner's reasons for rejecting Claims 15-26 and 32 respectfully fail to meet even the minimum requirements necessary for establishing and maintaining *prima facie* obviousness with respect to Bhat in view of Tanaka et al.

As is clearly stated in the MPEP, "[o]bviousness can *only* be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation *to do so* found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art" (*emphasis added*). MPEP §2143.01 *Suggestion or Motivation to Modify the References*.

Furthermore, the motivation to combine must be "found in the prior art, and *not* based on applicant's disclosure". *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir.1991) (*emphasis added*). As reasoned by the Federal Circuit,

"When patentability turns on the question of obviousness, the search for and analysis of the prior art includes evidence relevant to the finding of whether there is a teaching, motivation, or suggestion to select and combine the references relied on as evidence of obviousness. See e.g., *McGinley v. Franklin Sports, Inc.*, 262 F.3d 1339, 1351-52, 60 USPQ2d 1001, 1008 (Fed. Cir. 2001) ("the central question is whether there is reason to combine [the] reference," a question of fact drawing on the Graham factors).

"The factual inquiry whether to combine references must be thorough and searching." *Id.* It must be based on objective evidence of record. This precedent has been reinforced in myriad decisions, and cannot be dispensed with. See, e.g., *Brown & Williamson Tobacco*

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

Corp. v. Philip Morris Inc., 229 F.3d 1120, 1124-25, 56 USPQ2d 1456, 1459 (Fed. Cir. 2000) ('a showing of a suggestion, teaching, or motivation to combine the prior art is an 'essential component of an obviousness holding'') (quoting C.R. Bard, Inc., v. M3 Systems, Inc., 157 F.3d 1340, 1352 48 USPQ2d 1225, 1232 (Fed. Cir. 1998))". *In re Sang Su Lee*, 277 F.3d 1338, 61 USPQ2d 1430 (Fed. Cir. 2002).

Additionally, according to the Federal Circuit, " 'teachings of references can be combined only if there is some suggestion or incentive to do so' " (emphasis in original). *In re Fine*, 837, F.2d 1071, 1075, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988) (quoting *ACS Hosp. Sys., Inc. v. Montefiore Hosp.*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984). "[E]ven when the level of skill in the art is high, the Board [or the Examiner] must identify specifically the principle, known to one of ordinary skill, which suggests the claimed combination. In other words, the Board [or the Examiner] must *explain the reasons* one of ordinary skill in the art would have been motivated to select the references and to combine them to render the claimed invention obvious" (*emphasis added*). *In re Rouffet*, 149 F.3d 1350, 1359, 47 USPQ2d 1453, 1459 (Fed. Cir. 1998).

Thus, a motivation to combine is an *essential element* in establishing *prima facie* obviousness. For a motivation to be legitimate, there *must be a finding* that a 'teaching, suggestion, or motivation' to combine *exists*. There *must be objective evidence of record* from the prior art in light of the motivation both to support the Examiner's selection of the particular references and to support combining the elements or teaching thereof as proposed by the Examiner. The Examiner *is required* by way of reasoned explanation *to specifically identify the principle* known by the skilled artisan '*that suggests the claimed combination*'. The Examiner may not simply dispense with providing such evidence and reasoning in presenting the motivation to combine.

"[T]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art *also suggests the desirability* of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990)" (*emphasis added*). MPEP §2143.01, cited *supra*. For a motivation to combine/modify to be legitimate and therefore, be employed to support a *prima facie* case of obviousness, there must be "evidence that 'a skilled artisan, *confronted with*

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed”. *Ecolochem, Inc. v. Southern Calif. Edison Co.*, 227 F.3d 1361, 1375, 56 USPQ2d 1065, 1075 (Fed. Cir. 2000) (quoting *In re Rouffet*, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1456 (Fed. Cir. 1998)) (*emphasis is added*). Therefore, in addition to providing evidence from the prior art to support selecting and combining, the Examiner is *required* to establish and provide *evidence* to support the *desirability* of the combination in light of the *problem or problems* that faced *the inventor*.

Regarding Bhat and Tanaka et al., the Examiner’s motivation was to “provide a secure system by providing protection to the important data stored in portable devices when the devices are stolen”. The Examiner’s motivation is not a motivation for combining the disclosures of Bhat and Tanaka et al., as proposed by the Examiner. At best, the Examiner’s motivation is merely a restatement of the motivation that may have led Tanaka et al. to conceive their invention.

However, neither Bhat nor Tanaka et al. explicitly or implicitly suggests a motivation for their combination. Specifically, the Examiner has not and respectfully cannot point to anything in the disclosure of either Bhat or Tanaka et al. that indicates that adding the “sensor 205” disclosed by Tanaka et al. to the “security module 116” of Bhat would either result in making, “a secure system by providing protection to the important data stored in portable devices when the devices are stolen”. Thus, the Examiner’s motivation to combine/modify Bhat in view of Tanaka et al. is clearly not found ‘in the references themselves’, contrary to the Examiner’s contention.

The Examiner provided *no extrinsic evidence to support* a contention that a teaching, suggestion, or motivation *not found explicitly* in the cited references was *either present implicitly* in that taught by the references (which in this instance, clearly it is not) *or was in the knowledge generally available to one of ordinary skill in the art*. Specifically, *the Examiner cited nothing* (i.e., no extrinsic evidence) beyond the references themselves in support of the Examiner’s motivation. Therefore, the Examiner is not relying on implicit teachings or general knowledge of the skilled artisan. As such, the Examiner respectfully cannot contend that the Examiner’s motivation regarding Bhat and Tanaka et al. are “found either explicitly or implicitly in the references themselves or in the knowledge generally available to

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

one of ordinary skill in the art", as required by the courts to support *prima facie* obviousness. *In re Kotzab*, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000).

In addition, the Examiner's motivation lacks that necessary to qualify as a legitimate or supported motivation to combine/modify according to the courts. In particular, the Examiner offered no explanation regarding how the proposed motivation would lead the skilled artisan to select and combine the references as relied upon for the subject rejection. No explanation is presented regarding "the reasons one of ordinary skill in the art would have been motivated to select the references and to combine them [thereby rendering] the claimed invention obvious". *In re Rouffet*, cited *supra*. In short, the Examiner's motivation fails to address *why* a skilled artisan, *without* knowledge or benefit of Applicant's teachings, would make the *specific choice* to combine Bhat and Tanaka et al. as opposed to some other combination of references. In addition, the Examiner's motivation provides no insight into why one skilled in the art would have found it obvious to make the particular and specific modification of the relevant teachings of Bhat and Tanaka et al. that the Examiner suggests. Thus, the Examiner's motivation fails to address why the skilled artisan would have been motivated to combine/modify Bhat and Tanaka et al.

Moreover, the Examiner failed to establish, or for that matter, even attempt to establish, that the prior art or the skilled artisan with *no knowledge of the claimed invention* would have: (a) recognized the desirability of the combination/modification proposed by the Examiner, or (b) selected the specific elements from the cited prior art references for combination/modification, as suggested by the Examiner, when confronted with the same problem faced by the inventor. In fact, the Examiner did not explicitly or implicitly consider the problem(s) faced by the inventor as motivation for the combination/modification proposed by the Examiner. Similarly, the Examiner has not identified specifically the principle of or explained the reasons why the skilled artisan would have been motivated to select and combine the references. *In re Rouffet*, cited *supra*. Hence, the Examiner simply has not provided a legitimate motivation to combine the cited references in support of a *prima facie* case of obviousness.

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

An absence of a legitimate or supported motivation to combine Bhat and Tanaka et al. defeats a *prima facie* case of obviousness with respect to at least Claims 15-26 and 32. Furthermore, given the lack of a supported motivation to combine the respective references, any consideration regarding what the respective combination might or might not disclose is rendered moot.

Notwithstanding the lack of a supported motivation to combine/modify, the combination of Bhat and Tanaka et al. also fails to disclose or suggest *all* of the claim limitations of at least Claims 15-20, 22-26 and 32. In particular, the combination of Bhat and Tanaka et al. fail to disclose all of the claim limitations of base Claim 15. For example, the combination of Bhat and Tanaka et al. at least fail to disclose, "the return-to-owner information being displayed one or both of periodically after disablement and when a sensor in the electronic device detects a perturbation of the electronic device", as recited in Applicant's Claim 15. As such, the combination of Bhat and Tanaka et al. fails to disclose or suggest all of the limitations of Claim 15, as required by the courts for establishing and supporting *prima facie* obviousness. See *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Claims 16-20 are dependent from and include all of the limitations of Claim 15. For at least the same reasons given above for Claim 15, the references similarly lack disclosure of all of the limitations of the dependent Claims 16-20. As such, a *prima facie* case of obviousness by the combined teachings of Bhat and Tanaka et al. with respect to at least Claims 15-20 is defeated. *In re Royka*, cited *supra*.

Regarding Claims 22-23, both Bhat and Tanaka et al. do not disclose at least, "wherein the electronic device is a digital camera that further comprises an imaging subsystem and a power subsystem, the controller further controlling the operation of the imaging subsystem and the power subsystem", as recited therein. Claim 23 is dependent from and includes all of the limitations of Claim 22. Regarding Claim 24, while Tanaka et al. disclose a "sensor 205", Bhat and Tanaka et al., whether considered separately or together, do not disclose, "wherein a perturbation of the disabled electronic device detected by the perturbation sensor *causes* the return-to-owner information to be displayed on the user interface", as recited therein (*emphasis added*). Regarding Claim 26, as discussed in part above with respect to the 35 U.S.C. 102(e) rejection, Bhat fails to disclose, "wherein the disabled electronic device

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

completes a *shutdown process* and *switches* to an *OFF state*". Bhat further fails to disclose, "the return-to-owner information being displayed one or both of during the *shutdown process* and while *in the OFF state*, and wherein the enabled electronic device one or both of completes a start-up process to become operational and continues operation", as recited in Claim 26 (*emphasis added*). Tanaka et al. fail to add any of these elements lacking in the disclosure of Bhat, such that the combination of Bhat and Tanaka et al. fails to disclose all of the elements in Claim 26. Thus, a *prima facie* case of obviousness by the combination of Bhat and Tanaka et al. is defeated at least with respect to Claims 22, 23, 24 and 26,. *In re Royka*, cited *supra*.

In addition, Bhat fails to disclose all of the claim limitations of base Claim 30, as discussed above with respect to the 35 U.S.C. 102(e) rejection. Tanaka et al. fail to add the elements discussed above that are lacking in Bhat, such that the combination of Bhat and Tanaka et al. similarly fails to disclose all of the limitations of Claim 30. Claim 32 is dependent from and includes all of the limitations of Claim 30. For at least the same reasons set forth above for Claim 30, the combination of Bhat and Tanaka et al. fails to disclose or suggest all of the limitations of Claim 32. As such, *prima facie* obviousness by the combined teachings of Bhat and Tanaka et al. with respect to Claim 32 is defeated. *In re Royka*, cited *supra*.

The Examiner's rejection under 35 U.S.C. 103(a) lacks proper evidentiary support for establishing and maintaining a *prima facie* case of obviousness according to the courts. As such, the rejection of Claims 15-26 and 32 under 35 U.S.C. 103(a) by Bhat and Tanaka et al. must be withdrawn.

It is well established that, "the examiner bears the initial burden, on review of the prior art or on any other ground, of presenting a *prima facie* case of unpatentability" and "[i]f examination at the initial stage *does not* produce a *prima facie* case of unpatentability, then without more the applicant is entitled to grant of the patent" (*emphasis added*). *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992).


In summary, Claims 1-26 and 30-33 are pending and Claims 1-26 and 30-33 were rejected. In light of the discussion above, Applicant respectfully submits that Claims 1-26 and 30-33 are in condition for allowance. Applicant respectfully

Appl. No. 09/982,345
Resp./Amdt. dated Nov. 4, 2005
Reply to Office Action of Sep. 8, 2005

requests that Claims 1-26 and 30-33 be allowed and that the application be passed to issue at an early date.

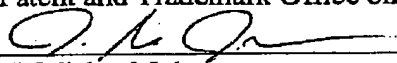
Should the Examiner's action be other than allowance of Claims 1-26 and 30-33, the Examiner is encouraged to contact the undersigned in order to possibly avoid an appeal to the Board of Patent Appeals and Interferences. Further, should the Examiner have any questions regarding the above, please contact the undersigned, J. Michael Johnson, at telephone number (775) 849-3085.

Respectfully submitted,
HEATHER N. BEAN ET AL.

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J. Michael Johnson

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